

Comanche County Telephone Co., Inc.

POST OFFICE BOX 290

DE LEON, TEXAS 76444

PHONE: AREA CODE 817 893-2003

February 1, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable James Quello
Federal Communications Commission
1919 M Street N.W.
Washington, DC 20554

RE: MM Docket No. 92-265, Program Access

Dear Mr. Quello:

I am writing you to express my concern about the Notice of Proposed Rule Making that was released on December 24, specifically as it pertains to the Section 19 programming access provisions of the recently-passed cable bill.

I am the General Manager of Comanche County Telephone Co., Inc., a consumer-owned, rural utility that provides telephone service to 5030 consumers in central Texas. In our part of Texas there are many consumers for whom cable service is unavailable due to their remoteness. The only way these consumers can receive television is by using a home satellite dish. Until now, these home satellite dish owners have been paying discriminatorily high rates for much of the programming they receive over their dish. The cost for this programming to home satellite dish distributors is on average five times more than what cable operators pay for it--a difference in price that is completely unjustifiable.

My utility, along with hundreds of utilities like it around the country, worked long and hard to secure the inclusion of the cable bill's Section 19 programming access provisions in order to protect our consumers from the cable industry's price-gouging. When the bill passed, we were understandably pleased and hopeful that the discrimination would stop.

This is why we are concerned by the tone of your NPRM on the subject. By writing this letter, I hope to impress upon you the reality of this price discrimination. For our consumers, it really is a dollars-and-cents issue. And it is completely unnecessary, it costs cable-owned programmers and satellite carriers no more to

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serve the rural home dish market than the urban cable market. In your NPRM, you indicated that harm against the dish market would have to be established before the FCC could issue regulations to correct it. I assure you that this harm not only exists, but that it is also an ongoing problem which robs hundreds of dollars per year from each of my satellite TV-watching neighbors and consumers.

I urge you to once again review the duty the U. S. Congress charged you with: namely, to issue regulations which will encourage competition in the video marketplace and bring an end to the unjustifiable discrimination against the non-cable video marketplace by cable-owned programmers. On behalf of the thousands of home satellite dish owners living in rural Texas, I hope your final rule fulfills this obligation.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Toney Prather", with a large, stylized loop at the beginning.

TONEY PRATHER
Executive Vice-President
& General Manager

TP/db

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Federal Communications Commission
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The Honorable Irvin S. Duggan
Federal Communications Commission
1919 M Street N.W.
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: MM Docket No. 92-265, Program Access

Dear Mr. Duggan:

I am writing you to express my concern about the Notice of Proposed Rule Making that was released on December 24, specifically as it pertains to the Section 19 programming access provisions of the recently-passed cable bill.

I am the General Manager of Comanche County Telephone Co., Inc., a consumer-owned, rural utility that provides telephone service to 5030 consumers in central Texas. In our part of Texas there are many consumers for whom cable service is unavailable due to their remoteness. The only way these consumers can receive television is by using a home satellite dish. Until now, these home satellite dish owners have been paying discriminatorily high rates for much of the programming they receive over their dish. The cost for this programming to home satellite dish distributors is on average five times more than what cable operators pay for it--a difference in price that is completely unjustifiable.

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TONEY PRATHER
Executive Vice-President
& General Manager

TP/db

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Sherrie T. Marshall
Federal Communications Commission
1919 M Street N.W.
Washington, DC 20554

RE: MM Docket No. 92-265, Program Access

Dear Ms. Marshall:

I am writing you to express my concern about the Notice of Proposed Rule Making that was released on December 24, specifically as it pertains to the Section 19 programming access provisions of the recently-passed cable bill.

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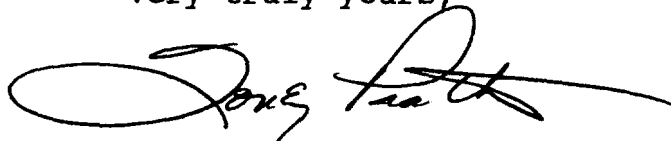
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TONEY PRATHER
Executive Vice-President
& General Manager

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street N.W.
Washington, DC 20554

RE: MM Docket No. 92-265, Program Access

Dear Mr. Barrett:

I am writing you to express my concern about the Notice of Proposed Rule Making that was released on December 24, specifically as it pertains to the Section 19 programming access provisions of the recently-passed cable bill.

I am the General Manager of Comanche County Telephone Co., Inc., a consumer-owned, rural utility that provides telephone service to 5030 consumers in central Texas. In our part of Texas there are many consumers for whom cable service is unavailable due to their remoteness. The only way these consumers can receive television is by using a home satellite dish. Until now, these home satellite dish owners have been paying discriminatorily high rates for much of the programming they receive over their dish. The cost for this programming to home satellite dish distributors is on average five times more than what cable operators pay for it--a difference in price that is completely unjustifiable.

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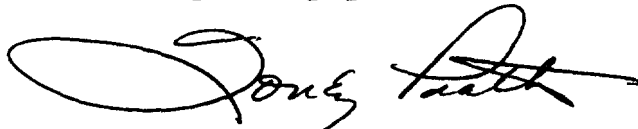
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